

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES LANGONE, as FUND MANAGER)
of the NEW ENGLAND TEAMSTERS AND)
TRUCKING INDUSTRY PENSION FUND)

Plaintiff,)

v.)

LINDEN MOTOR FREIGHT CO., INC.)

Defendant,)
_____)

C.A. No.04cv11734 RGS

AFFIDAVIT OF CATHERINE M. CAMPBELL

Catherine M. Campbell deposes and says as follows:

1. I represent the Plaintiff in the action now pending before this Court.
2. This is an complaint for the collection of delinquent withdrawal liability payments to the New England Teamsters and Trucking Industry Pension Fund pursuant to the Employee Retirement Income Security Act of 1974 ("ERISA"), 29 U.S.C. §1001, *et seq.*, as amended by the Multi-Employer Pension Plan Amendments Act, 29 U.S.C. §1381 *et. seq.*
3. As a Notice of Default was issued on November 8, 2004, action must be taken by the Plaintiff prior to December 8, 2004.
4. Concurrent with this case, there is an arbitration on the issue of the Fund's assessment of withdrawal liability pending before the American Arbitration Association, (Linden Motor Freight Co., Inc., v. New England Teamsters and Trucking Industry Pension Fund, AAA No. 11 621 02338-03.)

5. A deposition of the Defendant is now scheduled in the AAA matter for December 6, 2004.

6. Information obtained at this deposition may influence what action the Plaintiff takes in response to the Notice of Default. For example, Plaintiff may learn the identity of additional parties that will be added to the collection action now pending before this Court.

7. Consequently, Plaintiff requests an extension of thirty (30) days to take the necessary and appropriate action in this matter as required by the Standing Order.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 6th DAY OF
DECEMBER, 2004

/s/ Catherine M. Campbell
Catherine M. Campbell
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